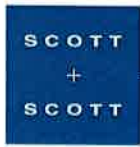


EXHIBIT B



PATRICK+McGAHAN

+ Private and Confidential +

+ Via Email +

August 12, 2019

Mark Ryan
Mayer Brown LLP
1999 K Street, N.W.
Washington, DC 20006-1101

Re: *In re Cattle Antitrust Litigation*
Lead Case No. 0:19-cv-1222 (JRT/HB)

Dear Mr. Ryan:

We write in response to your letter of August 8, 2019, by which the U.S. Defendants request discovery regarding the identity and employment history of the two confidential witnesses, "Witness 1" and "Witness 2", whose evidence is referred to in the Consolidated Amended Class Action Complaint filed on July 15, 2019 (the "CAC").

Your letter cites no legal authority that requires Plaintiffs to disclose the requested information at this stage of the litigation, or indeed, at any stage of the litigation. You appear to concede the absence of such an authority by seeking to justify your request on the absence of "a good reason" for Plaintiffs not to provide the requested information.

We therefore do not regard it appropriate to provide the information sought. Additionally, we do not agree that your clients' ability to move to dismiss the CAC under Federal Rules of Civil Procedure Rule 12(b)(6) is somehow prejudiced by our refusal to provide the factual information sought.

Best regards,
SCOTT+SCOTT ATTORNEYS AT LAW LLP

Patrick McGahan

Cc: Plaintiffs' Counsel